

Abbas Kazerounian, Esq. (SBN: 249203)
ak@kazlg.com
S. Mohammad Kazerouni, Esq. (SBN: 252835)
mike@kazlg.com
KAZEROUNI LAW GROUP, APC
245 Fischer Avenue, Suite D1
Costa Mesa, CA 92626
Telephone: (800) 400-6808
Facsimile: (800) 520-5523

[Additional Attorneys Listed on Signature Page]

Attorneys for Plaintiff,
Pooria Inalou

Lauri A. Mazzuchetti, Esq. (*Pro Hac Vice*)
lmazzuchetti@kelleydrye.com
KELLEY DRYE & WARREN LLP
200 Kimball Drive
Parsippany, NJ 07054
Telephone: (973) 503-5900
Facsimile: (973) 503-5950

[Additional Attorneys Listed on Signature Page]

Attorneys for Defendant,
ContextLogic, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

**POORIA INALOU, individually
and on behalf of all others
similarly situated,**

PLAINTIFF,

V.

CONTEXTLOGIC, INC.,

DEFENDANT.

Case No: 2:14-cv-02960-SVW-SH

**JOINT MOTION FOR DISMISSAL
OF ACTION WITH PREJUDICE AS
TO THE NAMED PLAINTIFF AND
WITHOUT PREJUDICE AS TO THE
PUTATIVE CLASS**

HON. STEPHEN V. WILSON

1 Plaintiff POORIA INALOU, (hereinafter “Plaintiff”) and Defendant
 2 CONTEXTLOGIC, INC. (hereinafter “Defendant”), (all jointly hereinafter referred to
 3 as “the Parties”), hereby move to dismiss the above entitled action with prejudice as
 4 to the named Plaintiff and without prejudice as to the Putative Class.

5 The notice and approval requirements of Federal Rule of Civil Procedure
 6 23(e)¹ are inapplicable to the parties’ settlement and dismissal of this putative class
 7 action because this action has not been certified as a class.

8 The Parties agree that this Court can proceed to dismiss this action entirely
 9 with prejudice as to the named Plaintiff and without prejudice as to the Putative
 10 Class. This Court retains jurisdiction to enforce the settlement of this action.

11
 12 Dated: June 8, 2016

**KAZEROUNI LAW GROUP,
 A.P.C.**

By: /s/ Abbas Kazerounian
 Abbas Kazerounian
 Attorneys for Plaintiff

13
 14
 15
 16
 17
 18
 19
 20 [Additional Attorneys for the Plaintiff]:

21
 22 Joshua B. Swigart, Esq. (SBN: 225557)
 josh@westcoastlitigation.com

23 **HYDE & SWIGART**

24 2221 Camino Del Rio South, Suite 101
 San Diego, CA 92108

25 Telephone: (619) 233-7770

26 Facsimile: (619) 297-1022

27
 28 ¹ Federal Rule of Civil Procedure 23(e) states “[t]he claims, issues or defenses of a certified class may be settled, voluntarily dismissed, or compromised only with the Court’s approval.

Todd M. Friedman, Esq. (SBN: 216752)
tfriedman@attorneysforconsumers.com
Suren N. Weerasuriya, Esq. (SBN: 278521)
sweerasuriya@attorneysforconsumers.com
LAW OFFICES OF TODD M. FRIEDMAN
324 South Beverly Drive, Suite 725
Beverly Hills, CA 90212
Telephone: (877) 206-4741
Facsimile: (866) 633-0228

Dated: June 8, 2016

KELLEY DRYE & WARREN LLP

By: /s/ Lauri A. Mazzuchetti
Lauri A. Mazzuchetti
Attorneys for Defendant

[Additional Attorneys for the Defendant]:

Lee S. Brenner, Esq. (SBN: 180235)
lbrenner@kelleydrye.com
Catherine D. Lee, Esq. (SBN: 258550)
CLee@kelleydrye
KELLEY DRYE & WARREN LLP
10100 Santa Monica Boulevard, 23rd Floor
Los Angeles, CA 90067
Telephone: (310) 712-6100
Facsimile: (310) 712-6199

Signature Certification

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Lauri A. Mazzuchetti, counsel for Defendant, and that I have obtained Ms. Mazzuchetti's authorization to affix her electronic signature to this document.

Dated: June 8, 2016

**KAZEROUNI LAW GROUP,
A.P.C.**

By: /s/ Abbas Kazerounian
Abbas Kazerounian
Attorneys for Plaintiff